## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

FREEDOM FROM RELIGION :

FOUNDATION, INC., DOE 1, BY DOE 1'S

NEXT OF FRIEND AND PARENT,

MARIE SCHAUB, WHO ALSO SUES ON

HER OWN BEHALF, DOE 2, BY DOE 2'S

NEXT OF FRIEND AND PARENT DOE 3,

WHO ALSO SUES ON DOE'S OWN

BEHALF,

C.A. No. 12-01319

Plaintiffs,

vs. : JURY TRIAL DEMANDED

NEW KENSINGTON-ARNOLD SCHOOL DISTRICT,

Defendant.

## JOINT MOTION TO EXTEND TIME TO COMPLETE DISCOVERY

The parties, by and through their respective counsel, file the following Joint Motion to Extend Time to Complete Discovery:

- 1. By way of this Court's Order of April 16, 2013, discovery is scheduled to close in this matter on August 23, 2013. The parties have engaged in discovery, but have not yet completed depositions.
  - 2. The parties seek an extension of 30 days to complete discovery.
- 3. Discovery would be completed on or before September 22, 2013, if this Motion is granted.
  - 4. The parties also ask that the post-discovery status conference be rescheduled.
  - 5. The parties anticipate no further enlargements of the discovery period.

WHEREFORE, the parties respectfully requests this Honorable Court grant the within Motion and extend the deadline for completion of discovery by 30 days until September 22, 2013 and that the post-discovery status conference be rescheduled.

Respectfully submitted,

## ANDREWS & PRICE

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